

THOMAS A. WOODS (SB #210050)
thomas.woods@stoel.com

COREY M. DAY (SB #311021)
corey.day@stoel.com

STOEL RIVES LLP
500 Capitol Mall, Suite 1600
Sacramento, CA 95814
Telephone: 916.447.0700
Facsimile: 916.447.4781

Attorneys for Plaintiff
POWER BUSINESS TECHNOLOGY, LLC

BOUTIN JONES INC.
Daniel S. Stouder (SBN 226753)
Ian K. McGlone (SBN 315201)
555 Capitol Mall, Suite 1500
Sacramento, CA 95814-4603
T: (916) 321-4444/F: (916) 441-7597
Email: dstouder@boutinjones.com
imcglone@boutinjones.com

Attorneys for Defendants
WiZiX Technology Group, Inc., Gary Johnson,
Tyler Johnson, Brad Farnum, and Joseph Power

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

POWER BUSINESS TECHNOLOGY, LLC,

Plaintiff,

vs.

WiZiX TECHNOLOGY GROUP, INC.;
GARY JOHNSON; TYLER JOHNSON;
BRAD FARNUM; JOSEPH POWER; and
DOE Defendants 1 through 20, inclusive,

Defendants.

Case No. 2:23-CV-00518-DAD-AC

**STIPULATION AND ~~PROPOSED~~
ORDER MODIFYING SCHEDULING
ORDER [ECF NO. 45]**

Complaint filed: March 17, 2023

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Plaintiff, Power Business Technology, Inc. (“Plaintiff”) and Defendants, WiZiX Technology Group, Inc. (“Wizix”), Gary Johnson, Tyler Johnson, Brad Farnum, and Joe Power (collectively “Defendants”), by and through their counsel of record, met and conferred on the existing scheduling order, issued on September 18, 2024. (ECF No. 45.)

The Parties agree that, despite diligent efforts to advance the case, good cause exists to modify the scheduling order. FRCP Rule 16(b). Additional time is necessary to complete discovery and prepare for trial. Specifically, the parties anticipate that discovery will require the review and production of a significant amount of electronically stored information (“ESI”), and will include the exchange of highly sensitive information that will necessitate a protective order. To that end, the parties are working on an ESI protocol, appropriate search terms, and stipulated protective order, in addition to meeting and conferring on other discovery-related issues. The current fact discovery deadline of July 7, 2025 creates an unnecessary burden on all parties, especially since trial is not set to begin until April of 2026. The Parties believe the scheduling order can be modified without changing the trial date.

Accordingly, the Parties hereby stipulate and submit the following proposed changes to certain deadlines in the September 18, 2024 scheduling order:

Deadline	Current Deadline	Proposed Deadline
Fact Discovery Shall Be Completed	July 7, 2025	December 1, 2025
Disclosure of Initial Experts and Production of Reports	July 18, 2025	December 15, 2025
Disclosure of Rebuttal Experts and Production of Reports	August 19, 2025	January 5, 2025
Expert Discovery Shall be Completed	September 16, 2025	January 16, 2026
Deadline to file all motions, except motions for continuances, temporary	October 31, 2025	January 23, 2026

1	restraining orders, or other emergency		
2	applications		
3	Final Pretrial Conference	February 25, 2026	No change.
4		at 10:00 a.m.	
5	Jury Trial	April 27, 2026	No change.
6		at 9:00 a.m.	

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8 DATED: April 18, 2025

STOEL RIVES LLP

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10 By: /s/ Corey M. Day
11 THOMAS A. WOODS
12 COREY M. DAY
13 Attorneys for Plaintiff POWER
BUSINESS TECHNOLOGY, LLC

14 DATED: April 18, 2025

BOUTIN JONES INC.

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16 BY: /s/ Ian K. McGlone
17 Daniel S. Stouder
18 Ian K. McGlone
19 Attorneys for Defendants
20 WiZiX Technology Group, Inc., Gary Johnson,
Tyler Johnson, Brad Farnum, and Joseph Power
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[PROPOSED] ORDER

Before the Court is the Parties' stipulation regarding proposed changes to the September 18, 2024 scheduling order. (ECF No. 45.) After reviewing the stipulation, the Court finds that good cause exists to revise the scheduling order and revises it as follows:

Deadline	Current Deadline	New Deadline
Fact Discovery Shall Be Completed	July 7, 2025	December 1, 2025
Disclosure of Initial Experts and Production of Reports	July 18, 2025	December 15, 2025
Disclosure of Rebuttal Experts and Production of Reports	August 19, 2025	January 5, 2026
Expert Discovery Shall be Completed	September 16, 2025	January 16, 2026
Deadline to file all motions, except motions for continuances, temporary restraining orders, or other emergency applications	October 31, 2025	January 23, 2026
Final Pretrial Conference	February 25, 2026 at 10:00 a.m.	No change.
Jury Trial	April 27, 2026 at 9:00 a.m.	No change.

IT IS SO ORDERED.

DATED: May 21, 2025


 ALLISON CLAIRE
 UNITED STATES MAGISTRATE JUDGE